

EXHIBIT C

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

CASE NO. 18-40920-nhl
CHAPTER 11

BRUCE JOHNSON AKA BRUCE DE-SHAWN JOHNSON,

Debtor.
-----X

RELIEF FROM STAY – REAL ESTATE AND
COOPERATIVE APARTMENTS

BACKGROUND INFORMATION

1. ADDRESS OF REAL PROPERTY OR COOPERATIVE APARTMENT: 85 South Portland Ave, Brooklyn, NY 11207
2. LENDER NAME: Franklin Credit Management Corporation, as servicer for Deutsche Bank National Trust Company, As Trustee, for Bosco Credit V Trust Series 2012-1
3. MORTGAGE DATE: October 26, 2006
4. POST-PETITION PAYMENT ADDRESS: Franklin Credit Management Corp., PO Box 829629, Philadelphia, PA 19182

DEBT AND VALUE REPRESENTATIONS

5. TOTAL PRE-PETITION AND POST-PETITION INDEBTEDNESS OF DEBTOR TO MOVANT AS OF DECEMBER 12, 2018 201,226.38 (THIS MAY NOT BE RELIED UPON AS A "PAYOFF" QUOTATION.)
6. MOVANT'S ESTIMATED MARKET VALUE OF THE REAL PROPERTY OR COOPERATIVE APARTMENT AS OF THE MOTION FILING DATE: \$1,794,000.00
7. SOURCE OF ESTIMATED MARKET VALUE: DEBTOR'S AMENDED SCHEDULE A

STATUS OF THE DEBT AS OF THE PETITION DATE

8. DEBTOR'S INDEBTEDNESS TO MOVANT AS OF THE PETITION DATE:

| | |
|--|---------------------|
| A. TOTAL: | <u>\$201,226.38</u> |
| B. PRINCIPAL: | <u>\$200,000.00</u> |
| C. INTEREST: | <u>\$0.00</u> |
| D. ESCROW (TAXES AND INSURANCE): | <u>\$0.00</u> |
| E. FORCED PLACED INSURANCE EXPENDED BY MOVANT: | <u>\$0.00</u> |
| F. PRE-PETITION ATTORNEYS' FEES CHARGED TO DEBTOR: | <u>\$1,201.38</u> |
| G. PRE-PETITION LATE FEES CHARGED TO DEBTOR: | <u>\$0.00</u> |

9. CONTRACT INTEREST RATE: 10.75000%

(IF THE INTEREST RATE HAS CHANGED, LIST THE RATE(S) AND DATE(S) THAT EACH RATE WAS IN EFFECT ON A SEPARATE SHEET AND ATTACH THE SHEET AS AN EXHIBIT TO THIS FORM. STATE THE EXHIBIT NUMBER HERE: .)

10. OTHER PRE-PETITION FEES, CHARGES OR AMOUNTS CHARGED TO DEBTOR'S ACCOUNT AND NOT LISTED ABOVE:

- RELEASE FEE \$25.00

(IF ADDITIONAL SPACE IS REQUIRED, LIST THE AMOUNT(S) ON A SEPARATE SHEET AND ATTACH THE SHEET AS AN EXHIBIT TO THIS FORM. STATE THE EXHIBIT NUMBER HERE: .)

AMOUNT OF POST-PETITION DEFAULT AS OF NOVEMBER 6, 2018

11. DATE OF RECEIPT OF LAST PAYMENT: NO POST-PETITION PAYMENTS HAVE BEEN RECEIVED

12. NUMBER OF PAYMENTS DUE FROM PETITION DATE TO : 10 PAYMENTS

13. Post-petition payments in default as of December 12, 2018:

| PAYMENT DUE DATE | AMOUNT DUE | AMOUNT RECEIVED | AMOUNT APPLIED TO PRINCIPAL | AMOUNT APPLIED TO INTEREST | AMOUNT APPLIED TO ESCROW | LATE FEE CHARGED |
|------------------|--------------------|-----------------|-----------------------------|----------------------------|--------------------------|------------------|
| 03/01/2018 | 1866.96 | | | | | |
| 04/01/2018 | 1866.96 | | | | | |
| 05/01/2018 | 1866.96 | | | | | |
| 06/01/2018 | 1866.96 | | | | | |
| 07/01/2018 | 1866.96 | | | | | |
| 08/01/2018 | 1866.96 | | | | | |
| 09/01/2018 | 1866.96 | | | | | |
| 10/01/2018 | 1866.96 | | | | | |
| 11/01/2018 | 1866.96 | | | | | |
| 12/01/2018 | 1866.96 | | | | | |
| Totals | \$18,669.60 | | | | | |

14. OTHER POST-PETITION FEES CHARGED TO DEBTOR:

A. TOTAL:

B. ATTORNEYS' FEES IN CONNECTION WITH THIS MOTION: \$850.00

C. FILING FEE IN CONNECTION WITH THIS MOTION: \$181.00

D. OTHER POST-PETITION ATTORNEYS' FEES:

E. POST-PETITION INSPECTION FEES:

F. POST-PETITION APPRAISAL/BROKER'S PRICE OPINION FEES:

G. FORCED PLACED INSURANCE EXPENDED BY MOVANT:

15. AMOUNT HELD IN SUSPENSE BY MOVANT:

16. OTHER POST-PETITION FEES, CHARGES OR AMOUNTS CHARGED TO DEBTOR'S ACCOUNT AND NOT LISTED ABOVE:

(IF ADDITIONAL SPACE IS REQUIRED, LIST THE AMOUNT(S) ON A SEPARATE SHEET AND ATTACH THE SHEET AS AN EXHIBIT TO THIS FORM. STATE THE EXHIBIT NUMBER HERE: .)

REQUIRED ATTACHMENTS TO MOTION

PLEASE ATTACH THE FOLLOWING DOCUMENTS TO THIS MOTION AND INDICATE THE EXHIBIT NUMBER ASSOCIATED WITH EACH DOCUMENT.

- (1) COPIES OF DOCUMENTS THAT ESTABLISH MOVANT'S INTEREST IN THE SUBJECT PROPERTY. FOR PURPOSES OF EXAMPLE ONLY, THIS MAY BE A COMPLETE AND LEGIBLE COPY OF THE PROMISSORY NOTE OR OTHER DEBT INSTRUMENT TOGETHER WITH A COMPLETE AND LEGIBLE COPY OF THE MORTGAGE AND ANY ASSIGNMENTS IN THE CHAIN FROM THE ORIGINAL MORTGAGEE TO THE CURRENT MOVING PARTY. (.)
- (2) COPIES OF DOCUMENTS THAT ESTABLISH MOVANT'S STANDING TO BRING THIS MOTION. (.)
- (3) COPIES OF DOCUMENTS THAT ESTABLISH THAT MOVANT'S INTEREST IN THE REAL PROPERTY OR COOPERATIVE APARTMENT WAS PERFECTED. FOR THE PURPOSES OF EXAMPLE ONLY, THIS MAY BE A COMPLETE AND LEGIBLE COPY OF THE FINANCING STATEMENT (UCC-1) FILED WITH THE CLERK'S OFFICE OR THE REGISTER OF THE COUNTY IN WHICH THE PROPERTY OR COOPERATIVE APARTMENT IS LOCATED. (.)

DECLARATION AS TO BUSINESS RECORDS

I, Gina S'Elia, THE Bankruptcy Manager

OF FRANKLIN CREDIT MANAGEMENT CORPORATION, AS SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR BOSCO CREDIT V TRUST SERIES 2012-1, THE MOVANT HEREIN, DECLARE PURSUANT TO 28 U.S.C. SECTION 1746 UNDER PENALTY OF PERJURY THAT THE INFORMATION PROVIDED IN THIS FORM AND ANY EXHIBITS ATTACHED HERETO (OTHER THAN THE TRANSACTIONAL DOCUMENTS ATTACHED AS REQUIRED BY PARAGRAPHS 1, 2, AND 3, ABOVE) IS DERIVED FROM RECORDS THAT WERE MADE AT OR NEAR THE TIME OF THE OCCURRENCE OF THE MATTERS SET FORTH BY, OR FROM INFORMATION TRANSMITTED BY, A PERSON WITH KNOWLEDGE OF THOSE MATTERS; THAT THE RECORDS WERE KEPT IN THE COURSE OF THE REGULARLY CONDUCTED ACTIVITY; AND THAT THE RECORDS WERE MADE IN THE COURSE OF THE REGULARLY CONDUCTED ACTIVITY AS A REGULAR PRACTICE.

I FURTHER DECLARE THAT COPIES OF ANY TRANSACTIONAL DOCUMENTS ATTACHED TO THIS FORM AS REQUIRED BY PARAGRAPHS 1, 2, AND 3, ABOVE, ARE TRUE AND CORRECT COPIES OF THE ORIGINAL DOCUMENTS.

EXECUTED AT Jersey City NJ
ON THIS 14 DAY OF December 2018

NAME Gina S'Elia
TITLE Bankruptcy Manager
MOVANT Franklin Credit Management
STREET ADDRESS 101 Hudson Street, 2nd FL Corporation
CITY, STATE ZIP CODE Jersey City NJ 07302

DECLARATION

I, Gina S'Elia, THE Bankruptcy Manager

OF FRANKLIN CREDIT MANAGEMENT CORPORATION, AS SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR BOSCO CREDIT V TRUST SERIES 2012-1, THE MOVANT HEREIN, DECLARE PURSUANT TO 28 U.S.C. SECTION 1746 UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT BASED ON PERSONAL KNOWLEDGE OF THE MOVANT'S BOOKS AND BUSINESS RECORDS.

EXECUTED AT Jersey City, NJ
ON THIS 14 DAY OF December 2018

NAME Gina S'Elia
TITLE Bankruptcy Manager
MOVANT Franklin Credit Management
STREET ADDRESS 101 Hudson St. 2nd FL Corporation
CITY, STATE ZIP CODE Jersey City NJ 07302